

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
: :
Gregory K. Tate : No. 22-11408-MDC
Debtor :

ANSWER TO MOTION OF LOANCARE, LLC
FOR RELIEF FROM THE AUTOMATIC STAY UNDER SECTION 362
AND CERTIFICATE OF SERVICE

1. Debtor admits payments were missed and Debtor asks for a chance to get caught up.

WHEREFORE Debtor respectfully requests this Honorable Court deny Movant's Motion for Relief.

/s/ David M. Offen
David M. Offen
Attorney for Debtor

Dated: 08/16/2022

A copy of this Answer is being served on Brian C. Nicholas, Esquire, and the Chapter 13 Trustee.